

Black Hills National Forest Unsustainable Timber Program



What you should know about timber sales and logging on the Black Hills National Forest

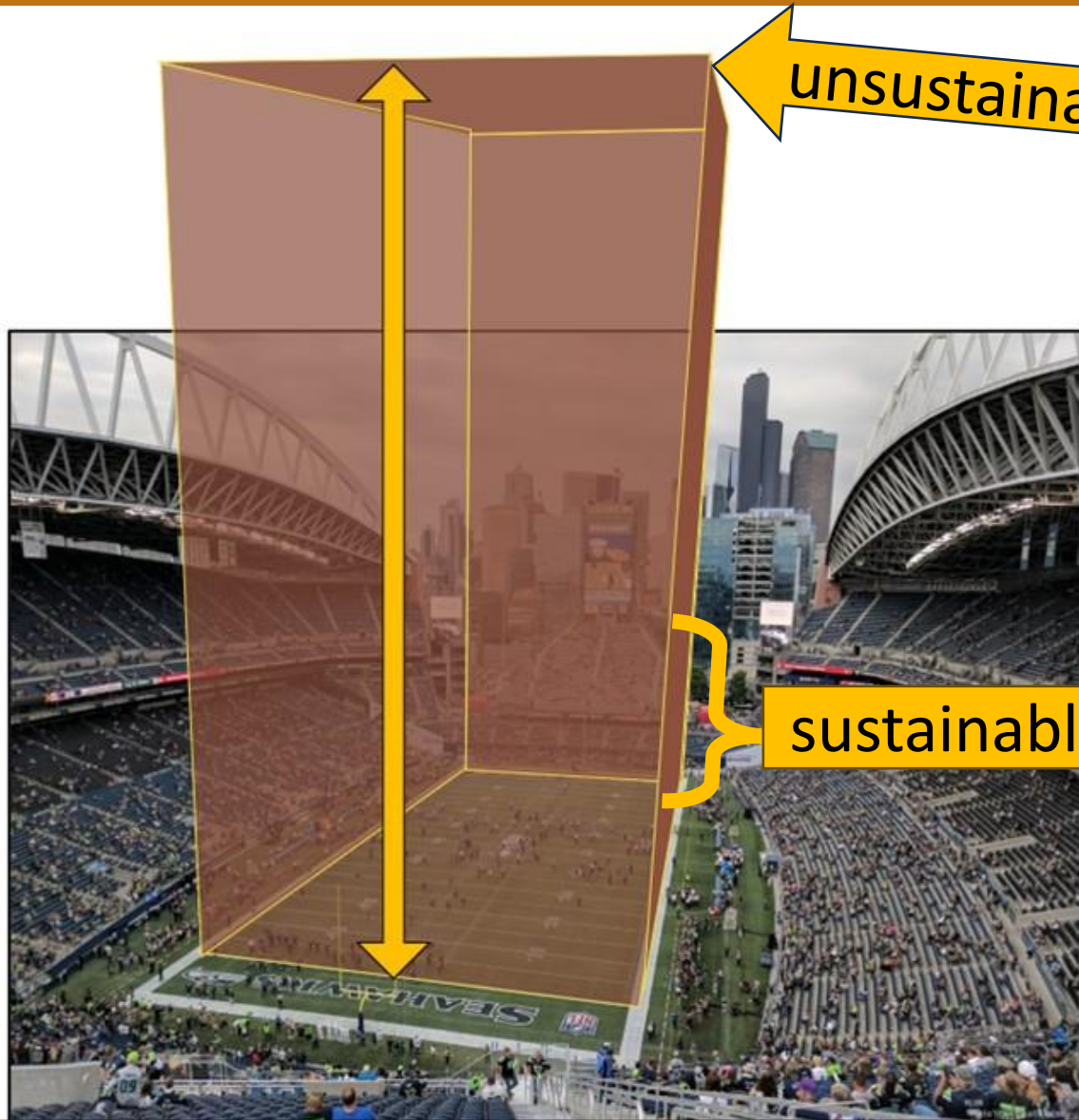
A historical map of the Black Hills National Forest area, showing topographical features, peaks, and various regions. The map is overlaid with text and symbols. The text is in white and pink colors. The symbols are white and pink swirls. The map shows peaks like Crow Peak, Terry's Peak, and Custer's Peak. It also shows regions like 'High hills heavily wooded' and 'Water & grass abundant'. There are dates like 'July 22', 'July 24', 'Aug 7', 'Aug 10', and 'Sep 29 to Oct 3'. The map is titled 'Black Hills National Forest' in large white letters.

Black Hills National Forest

☼ **The Black Hills National Forest is the home of Case #1, the first sale of timber on federal land.**

☼ **The region has had a long tradition of socially accepted logging.**

☼ **However, now things have changed...**



unsustainable

sustainable

Harvest levels of the past have become unsustainable.

Growth on the forest is a net loss.

Simply...

Forest growth cannot keep up with harvests.

The data show that at the allowable rate, all mature trees will be gone within 31 years.

Allowable Sale Quantity (ASQ)

181,000 CCF is the size of a football field stacked 377 feet high



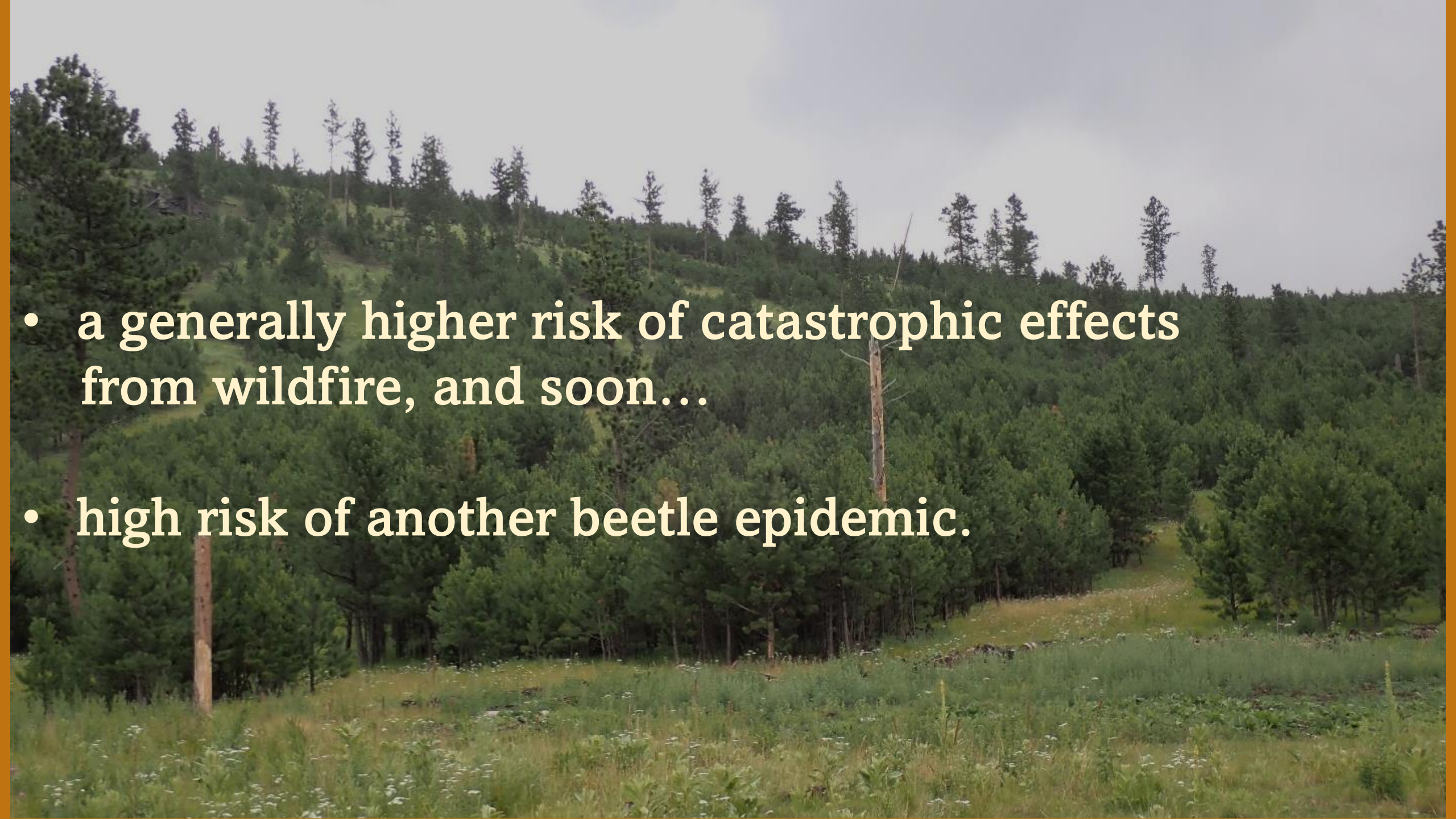
The consequences?

(why unsustainable logging matters to you)

- **Degradation of habitat, soils, and loss of biodiversity and biocomplexity, and...**

- lost cultural and recreational opportunities, and...



- 
- a generally higher risk of catastrophic effects from wildfire, and soon...
 - high risk of another beetle epidemic.



- It may result in a total crash of an industry considered important for the management of the forest

As time goes by, it will become more and more difficult to recover.



How did this happen?



There are three contributing factors...

Fire (natural mortality)



The Jasper fire, 2000: 83,000 acres of the timber breadbasket burned, and other fires followed.

Bugs (natural mortality)



Expansive mountain pine beetle epidemic 1997-2016: 440,000 acres affected

Logging (removals)



Over the past 25 years, high logging levels have affected more acres than the mountain pine beetle epidemic and fires combined.

**Understanding the issue
can be complicated, but
it's important to...**

Disinformation
Healthy Forests
Restoration Act
(HFRA)

Multiple-Use
Sustained Yields
Act (MUSYA)

Vegetation
Management
Project

Habitat structural stages
NEPA

Suitable base

Old growth

Commercial thinning

Environmental
Analysis (EA)

Regulatory Capture
Uneven-aged

National
Environmental
Policy Act (NEPA)

Forest
Management Act
National Forest
Management Act

Categorical exclusion (CE)

Emergency Action
Determination (EAD)

Regulatory
Capture

Cumulative Mean
Annual Increment
(CMAI)

National Forest
Advisory Board
(NFAB)

Site
index

Unsuitable base
Timberstand
improvement
(TSI)

United States
Department of
Agriculture (USDA)

Environmental
Impact Statement
(EIS)

Prescribed
burning

United States
Forest Service
(USFS)

Timber sale

Current Forest Plan

Overstory removal

Even-aged
treatments

keep in mind the Law....

Multiple-Use Sustained-Yield Act **(MUSYA)**

is a Congressional Act that requires the Forest Service to manage the national forest for multiple use and sustained yield of the products and services obtained from it.

- ***Multiple use* - the “management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people....”**
- ***Sustained yield* – “the achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of the national forests *without impairment of the productivity of the land.*”**

The fact is...

Counter to the law, the Black Hills National Forest is being logged unsustainably to the detriment of the values most people hold dear.

Industry, politicians and senior-leadership of the U.S. Forest Service are disregarding the law despite *plenty of evidence* the productivity of the Black Hills National Forest is being impaired by their actions.

What evidence?



A Scenario-Based Assessment to Inform Sustainable Ponderosa Pine Timber Harvest on the Black Hills National Forest

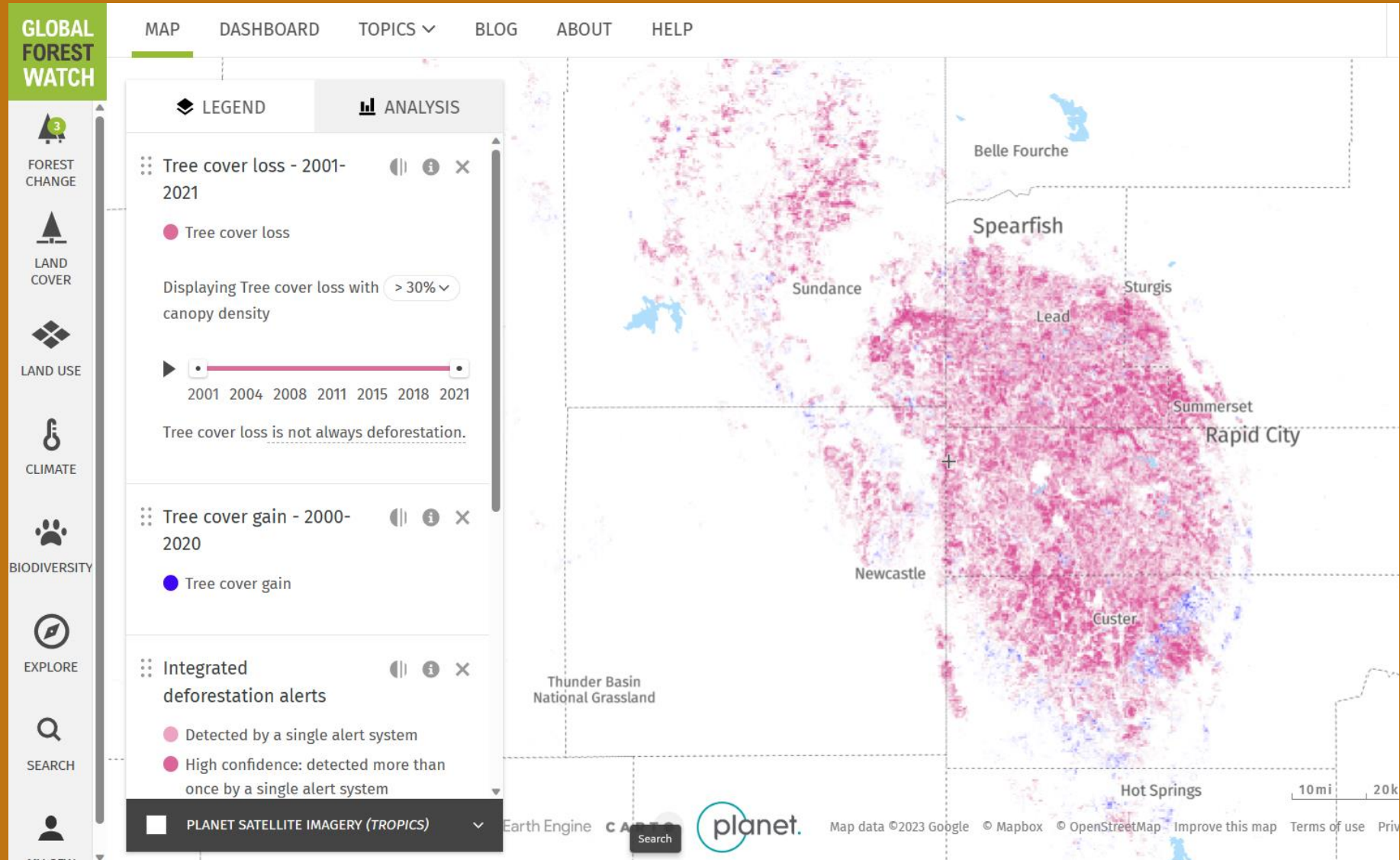
Russell T. Graham, Mike A. Battaglia, and Theresa B. Jain



General Technical Report 422 concluded that the current Allowable Sale Quantity is unsustainable in any of the 66 scenarios studied

“To evaluate options concerning the future timber management program, we conducted a quantitative analysis to determine how mortality from these disturbances and potential growth rates will impact short, mid, and long term sustainable sawtimber harvest levels of ponderosa pine.”

Global Forest Watch data show heavy tree cover loss since 2000



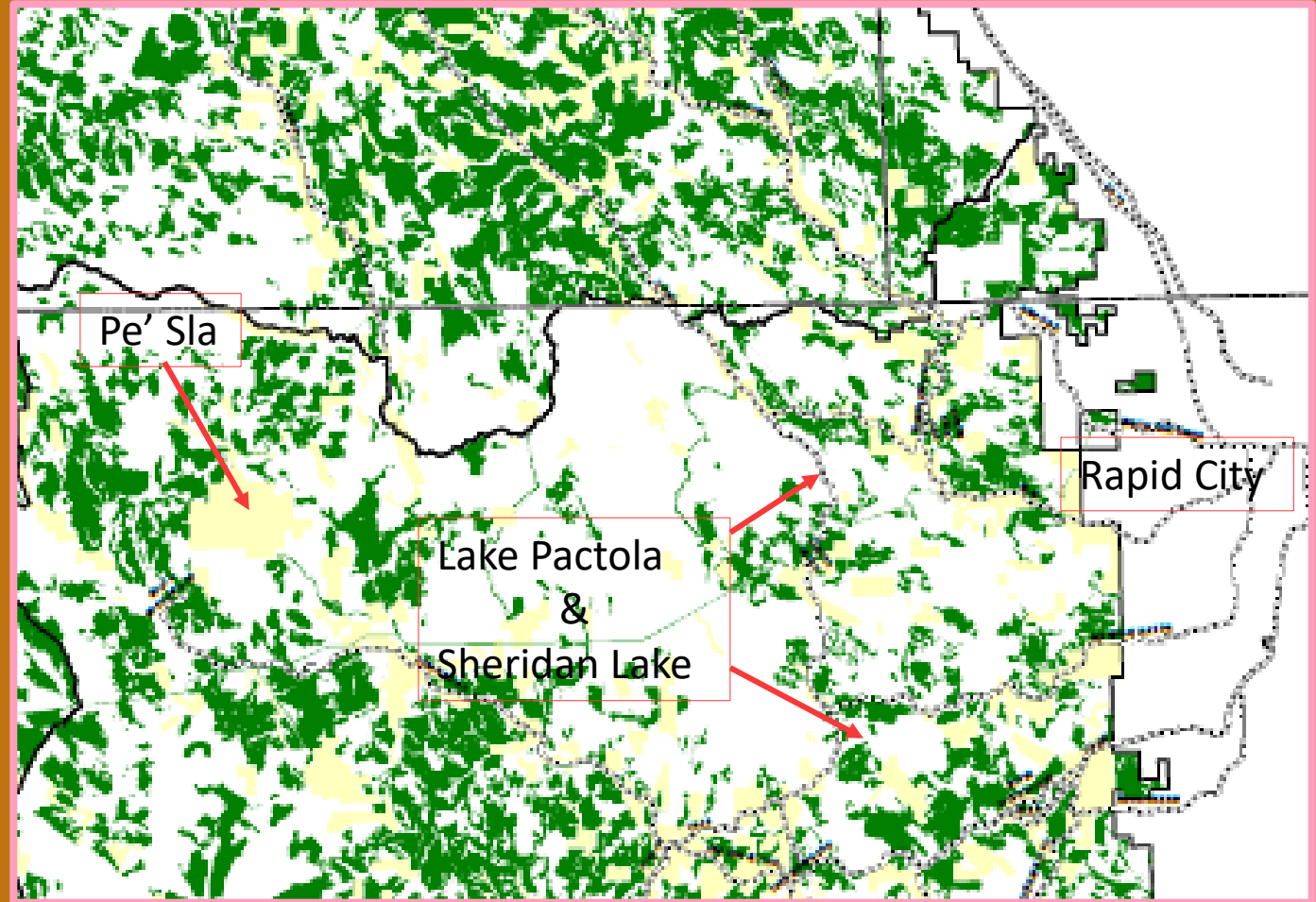
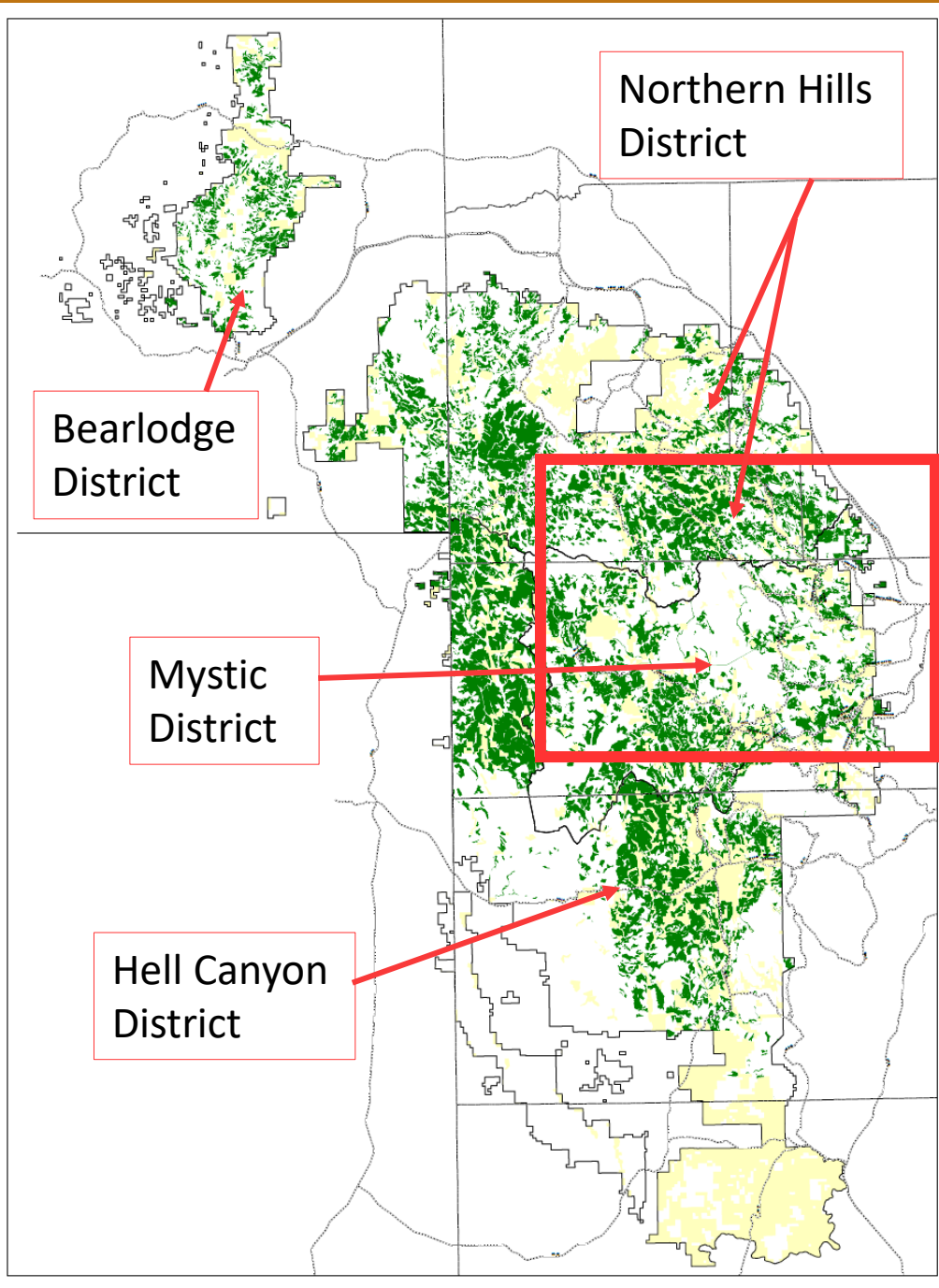
Technical data are supported by on the ground and drone reconnaissance,



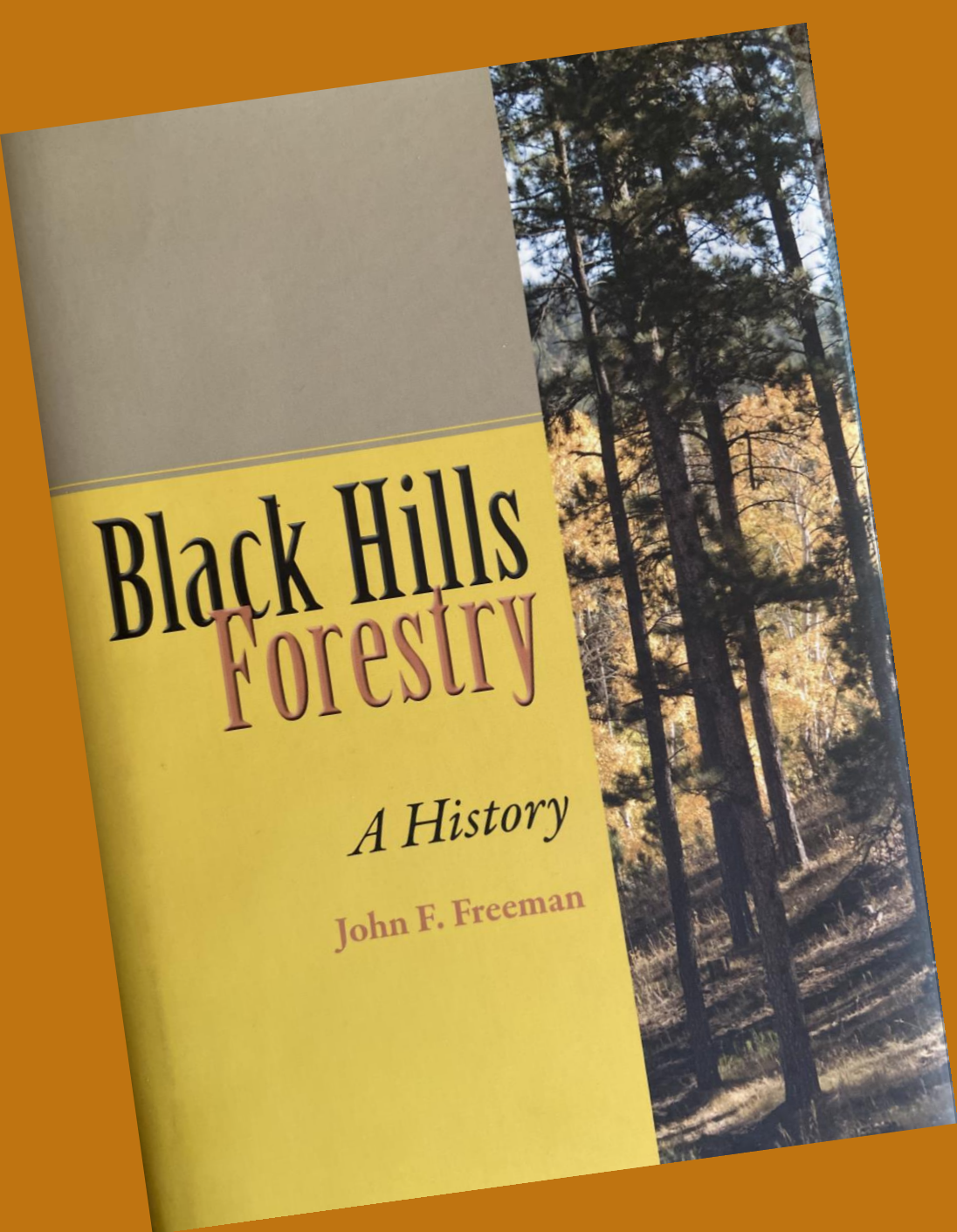
Google Earth satellite imagery,



Maps obtained from Forest Service via the Freedom of Information Act (FOIA),



Areas in green show where logging has occurred on the forest.
Some have hosted heavy logging equipment three times in 15 years.



and even the words of local Forest Service officials who have discussed and made promises for correction since at least 2005:

“In 2005 when Craig Bobzien arrived in Custer as the new Supervisor of the Black Hills National Forest, he and his district rangers took a “hard look” at the entire timber sale program and concluded “that the Forest Service could indeed meet the timber industry’s demand but only for four years, after which allowable quantities would drop dramatically.”

~ John F. Freeman, “Black Hills Forestry” 2014, p. 218.

**Why can't they
just stop overcutting?**



Because of pressure from industry and politicians.



 **Senator John Thune** 
@SenJohnThune

Updated folks from the Black Hills Forest Resource Association on my meeting yesterday with [@forests-service](#) Chief Randy Moore. I'll continue advocating for proper management of the Black Hills National Forest.

4:09 PM · Oct 28, 2021 · Twitter Web App

1 Retweet 1 Quote Tweet 17 Likes

 **Big T** @Alanfr... · Oct 28, 2021
Replying to @SenJohnThune and @forests-service
I thought we just had to sweep it?

Senator John Thune with timber industry representatives. They say that the timber industry is an important tool for “proper management” of the Forest, but their demands will result in complete loss of industry in the region.

Politicians have repeatedly urged the Forest Service to keep logging even greater amounts than allowed in the Forest Plan

November 28, 2018

Vicki Christiansen
Forest Service
Independence Avenue, SW
Washington, DC 20250-1111
Christiansen:

...at that date, the forest industry has
in the Black Hills over the last 20 years, and any reductions to the BHNF
will reduce the infrastructure even further, along with the ability to address
hazards. Local companies, communities, and the health of the forest
program that meets the needs of existing forest products companies.

of 2017, the BHNF held collaborative meetings with multiple sta
n of timber resources on the Forest and what, if any, effects those
program. Through those meetings, it was determined that the F
program steady at least until data from an intensified Forest Inv
was available in mid-2019 and then determine if any change
laborative process involving those stakeholders.

izing the intensified FIA data was described in a 2016 re
Weldon to Wyoming and South Dakota members of C
r better information with, "To increase the accuracy of
with the agency's Research and Development Fores
the inventory for the Black Hills National Forest. F
on which to inform future projections and manage
forest land management plan."

ce keep the annual BHNF timber sale progr
complete forest inventory data on all plots i
with South Dakota and Wyoming state forest
ts representatives. We also request that i
Forest Plan until the aforementioned da
e need, if any, for plan revision.

er program is a priority for this adr
harvest. Local forest products com
ut updated information and need

sales is premature and poses

quest.

Sincerely,

Congress of the United States
Washington, DC 20510

March 3, 2021

The Honorable Vicki Christiansen
Chief
U.S. Forest Service
1400 Independence Avenue, SW
Washington, DC 20250-1111

Dear Chief Christiansen:

We write to express concern with the U.S. Forest Service (USFS) recommendation to reduce timber sale program on the Black Hills National Forest (BHNF) and the process the USFS used to reach this recommendation. Further, we are concerned that a reduction in the sale program would have a detrimental impact on the ability of the USFS to manage and care for the forests in the Black Hills and on the health of our local communities.

Notably, the BHNF Advisory Board recently recommended that the timber sale program not be reduced below the allowable sale quantity in the current BHNF forest plan. This recommendation was formed with participation by the South Dakota and Wyoming state foresters, forest management professionals, and others after months of research and data analysis.

In 2018, the South Dakota and Wyoming Congressional offices wrote to you expressing concern with the premature efforts by the BHNF to examine flawed data pertaining to timber resources on the BHNF while new information was being gathered by the Forest Inventory and Analysis (FIA). At the time, stakeholders in the Black Hills were assured there would be a collaborative process to examine the data and develop a path forward for the best use of the data collected by the FIA. This position of collaboration was reiterated in your response letter which stated, "When the FIA dataset becomes available we will work collaboratively with industry and to develop a course of action for analysis."

Unfortunately, we are concerned about the
how to use the FIA data. At the
BHNF was con

Chief Tom Tidwell
USDA Forest Service
1400 Independence Ave, SW
Washington, DC 20250-1111

Dear Chief Tidwell:


We are writing to request an increase in the FY 2016 timber sale program for the Black Hills National Forest (BHNF). Notwithstanding the obvious successes of the BHNF's timber sale program, we are concerned that the sawtimber volume planned for sale in FY 2016 is inadequate to sustain the existing forest products infrastructure.

Although there have been some recent successes in fighting the mountain pine beetle in the Black Hills, the epidemic is far from over. Approximately 17,000 acres of trees were killed in 2015 in the BHNF as a result of the mountain pine beetle infestations, which is an increase over the 2014 acreage killed by the mountain pine beetle. Equally as concerning, according to recent Forest Service statements, approximately 50 percent of the BHNF remains at high risk for mountain pine beetle infestation. Salvaging and utilizing those trees is far more preferable than allowing them to become fuel for forest fires that threaten the communities and forests of the Black Hills.

We request an increased FY 2016 sale program, with a sawtimber target of 220,000 ccf, which would: 1) sustain the current forest products industry; 2) salvage more acres of trees already attacked by mountain pine beetles; 3) treat additional acres resulting in reduced potential for further mountain pine beetle infestations; and 4) reduce fire danger.

We look forward to your response. Thank you for your consideration.


Sincerely,

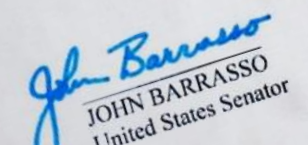

JOHN THUNE
United States Senator


M. MICHAEL ROUNDS
United States Senator

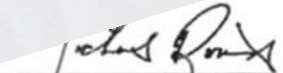

MICHAEL B. ENZI
United States Senator


KRISTI NOEM
United States Congressman


CYNTHIA LUMMIS
United States Congressman


JOHN BARRASSO
United States Senator

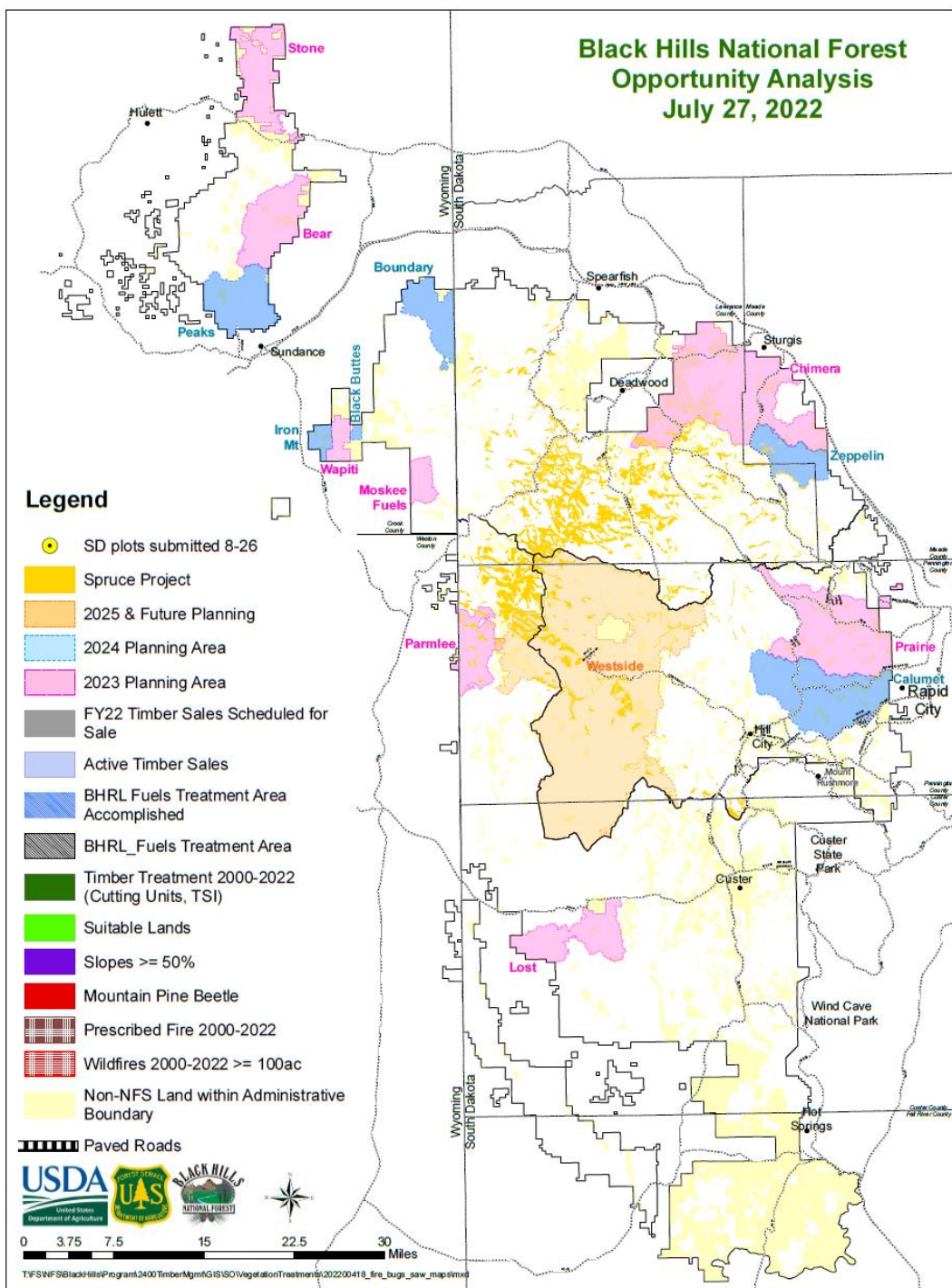
PRINTED ON RECYCLED PAPER


M. MICHAEL ROUNDS

9

**Black Hills National Forest
Opportunity Analysis
July 27, 2022**

It is apparent that local Forest Service employees work at the pleasure of these politicians and are prepared for even more unsustainable logging as seen on this map obtained by FOIA.





Meanwhile, the timber industry lobby preys on the people's fear of fire and bugs to promote public support for more logging without defining the "proper management" of which they often speak.

DID YOU KNOW?

Just because it's cold and snowy, doesn't mean it can't burn later.

What can you do?



**Comment
Contact
&
Question**

Comment on Black Hills National Forest “Vegetation Management” projects...

Opportunities to comment happen a couple of years before a logging sale is up for bids.

The Forest Service needs to hear from you, the public, during initial stages of projects!

In your comments, let Forest Service know what you value about the Forest and request:

- sustainable timber management
- due consideration & care of natural attributes of the Forest (i.e. botany and wildlife habitat)
- a full suite of management actions including prescribed burning
- protection of our remaining mature and old growth
- actions that follow the policies, regulations, and laws that govern management of our National Forests

Vegetation Management projects may be found at: [Black Hills National Forest - Projects \(usda.gov\)](https://www.usda.gov/black-hills-national-forest-projects)

You can request email notification for new projects by emailing: scott.jacobson@usda.gov

Contact the people responsible for the overcutting...

Senator John Thune
US Senate SD-511
Washington, DC 20510
Phone: (202) 224-2321
Fax: (202) 228-5429
Toll-Free: 1-866-850-3855

Ryan Donnelly, Legislative Assistant

Senator Mike Rounds
Hart Senate Office Bldg., Suite
502
Washington, DC 20510
Phone: (202) 224-5842
Toll Free: (844) 875-5268

Rep. Dusty Johnson
1714 Longworth HOB
Washington, DC 20515
Phone: (202) 225-2801
Toll Free: (855) 225-2801

Chance Hunley, Policy Advisor

- tom.Vilsack@sec.usda.gov U.S.D.A. Secretary of Agriculture
- randy.moore@usda.gov U.S. Forest Service Chief
- frank.beum@usda.gov Region 2 Forester
- jacqueline.buchanan@usda.gov Region 2 Deputy Forester
- krista.landreneau@usda.gov BHNF administrative assistant to the Supervisor

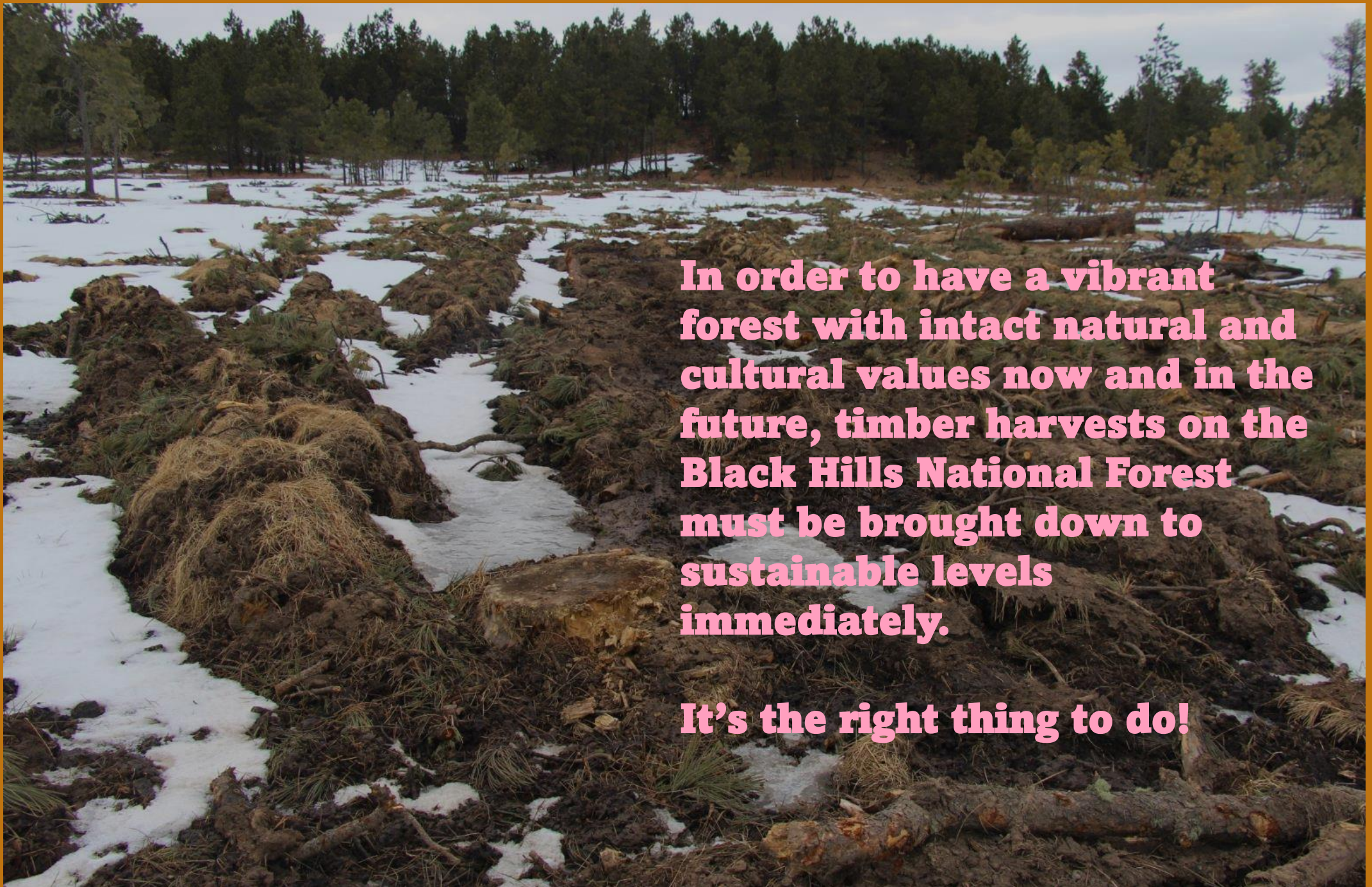
Question

what you hear...

Beware when you hear:

- **talk about “proper” management without acknowledgement of the unsustainable logging happening now.**
- **promotion of fear of wildfire & bugs and “management” as the solution.**
- **statements suggesting “management” is always good for wildlife, plants, and recreation.**
- **statements claiming a need to “manage” steep slopes & the “unsuitable base.”**
- **that local Forest Service personnel are “outsiders” who are “mismanaging” the Forest.**

and spread the word!



In order to have a vibrant forest with intact natural and cultural values now and in the future, timber harvests on the Black Hills National Forest must be brought down to sustainable levels immediately.

It's the right thing to do!

For More Information:

- **General Technical Report 422:** [A Scenario-Based Assessment to Inform Sustainable Ponderosa Pine Timber Harvest on the Black Hills National Forest \(usda.gov\)](#)
- **More info on GTR 422:** [Sustainable timber harvest on the Black Hills National Forest | US Forest Service Research and Development \(usda.gov\)](#)
- **Webinar:** [Webinar: Science-Based Scenarios to Inform Forest Management on the Black Hills National Forest | US Forest Service Research and Development \(usda.gov\)](#)
- **Video: “Science: Narrative vs. Truth on the Black Hills”** Solomon Smith, M.S. Applied Anthropology, UNT: <https://www.facebook.com/norbecksociety/videos/893918888627765>
- **Global Forest Watch website map:** [Interactive World Forest Map & Tree Cover Change Data | GFW \(globalforestwatch.org\)](#)
- **May 2023 Stacker article “10 States with the Highest Levels of Tree Cover Loss”:** [10 States With the Highest Levels of Tree Cover Loss | The Rounds \(stacker.com\)](#)
- **Videos of upper-level management of Forest Service and politicians:** [Thune and Buchanan - YouTube](#)
- **Interactive map showing timber harvests (mostly overstory removal, a.k.a. “liberation cuts” under the “Black Hills Resilient Landscapes” project – click on the “timber harvests” tab:** [Black Hills Resilient Landscapes Project Implementation \(arcgis.com\)](#)
- **PDF maps (obtained by FOIA from BHNF) with interactive layers in Adobe Acrobat Reader may be obtained by emailing:** info@norbecksociety.com

